

# TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

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November 1, 2006

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TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor *pgl*

FROM: Wayne H. Western, Team Lead *W.H.W.*

RE: Installation of Ventilation Shaft/Blowing Fan, Andalex Resources Inc.,  
Centennial Project, Permit C/007/0019, Task ID #2679

**SUMMARY:**

On October 25, 2006, the Permittee submitted an amendment for the installation of a ventilation fan and substation. The construction of the facilities is scheduled to occur within the disturbed area. This memo deals with engineering and bonding.

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**MINING OPERATIONS AND FACILITIES**

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

**Analysis:**

The Permittee meet the minimum requirements of this section. The Permittee installed a blowing ventilation fan and substation. The Permittee needs the facilities to increase the airflow to the mine. They show the location of the structures on Plate 6.

**Findings:**

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

**SPOIL AND WASTE MATERIALS**

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

**Analysis:**

**Coal Mine Waste**

The Permittee met the minimum requirements of this section. The Permittee will place all coal mine waste underground. The requirements for coal mine waste disposal are:

- Minimize effects of leachate: This requirement will be addressed in the hydrology section.
- Ensure mass stability: Because the material is stored underground the material will be stable after placement.
- Ensure revegetation: NA since the material is disposed of underground.
- Not a public hazard: The material will be in an area not accessible by the public.
- Prevent Combustion: The material is noncombustible.

**Findings:**

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

## **MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

**Analysis:**

### **Mining Facilities Maps**

The Permittee met the requirements of this section by showing the new facilities on Plate 6.

### **Certification Requirements**

The maps were not properly certified. Each map must have an original certification and the each revision must have an original certification.

**Findings:**

The information in the proposed amendment is not considered adequate to meet the requirements of this section. Before the Division can approve the amendment, the Permittee must provide the following in accordance with:

**R645-301-512.120**, The Permittee must have all maps that require certification to be properly certified. Each map must have an original certification and the each revision must have an original certification.

## **RECLAMATION PLAN**

### **BACKFILLING AND GRADING**

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

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**Analysis:**

**General**

The Permittee met the requirements of this section. The Permittee will reclaim the site according to the approved mining and reclamation plan. The Permittee will not change the

**Findings:**

The Permittee meet the minimum requirements for this section.

**MINE OPENINGS**

Regulatory Reference: 30 CFR Sec. 817.13, 817.14, 817.15; R645-301-513, -301-529, -301-551, -301-631, -301-748, -301-765, -301-748.

**Analysis:**

The Permittee did not meet the minimum requirements for this section. The Permittee must include a monitoring plan for the shaft backfill, or show that the backfill material will not settle. If settling does occur, the Permittee must have a plan to deal to correct the problem.

**Findings:**

**R645-301-551**, The Permittee must include a plan for monitoring the reclaimed shaft for settling and a monitoring plan for dealing with backfill in the shaft settling.

**BONDING AND INSURANCE REQUIREMENTS**

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

**Analysis:**

**General**

The Permittee must increase the bond to cover the cost to reclaim the ventilation shaft and fan. In addition, the Permittee must also update the reclamation cost estimate in the MRP. The Division will provide the Permittee with an updated reclamation cost estimate in either electronic or hard copy.

**Findings:**

The information in the proposed amendment is not considered adequate to meet the requirements of this section. Before the Division can approve the amendment, the Permittee must provide the following in accordance with:

**R645-301-830.140 and R645-301-830.200,** The Permittee increase the bond amount to cover the cost to reclaim the shaft and fan. In addition, the Permittee must include updated reclamation cost estimates in the MRP. The Division will supply the Permittee with either electronic or hard copies of the reclamation cost estimate.

**RECOMMENDATIONS:**

The Division should deny the amendment until after all of the above-mentioned deficiencies have been adequately addressed.